

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION

USA)	
)	
<i>Plaintiff,</i>)	
)	
v.)	CAFN: 5:21-cr-00023
)	
RICHARD MOORE)	
)	JURY TRIAL DEMANDED
)	
)	
<i>Defendant.</i>)	

**MOTION FOR ORDER TO IDENTIFY EACH DOUMENT RELIED UPON TO
CREATE EACH SUMMARY REPORT FOR USE AT TRIAL**

Richard Moore respectfully files this Motion requesting that this Court order the government to provide all documents relied upon to support its use of each summary, chart, or calculation. As this Court knows, the government agreed to abide by the law (Fed. R. Evid. 1006 and Fed R. Crim P 16) by identifying the supporting documents for its ten summary charts, the last of which was provided on November 25, 2024.

Also, the government has provided “**drafts**” of the summary reports, yet, Mr. Moore request that the final version of these summary reports with all documents used to support each report be disclosed **no later than December 6,**

2024 because the government has had three years to do all these “summary charts” and waited to the last week before the December 2, 2024 deadline to “supplement” its prior belated disclosure of “draft” summary charts. (See Ex. 1.)

Furthermore, Mr. Moore would like the Court to order the government to ensure that all documents for each summary report correspond to each summary report in an easily identifiable manner so that Mr. Moore can easily match relevant documents to the summary reports that all documents pertain to. This is necessary to challenge the admission of the documents that the government relied upon to support each summary report, because if the underlying documents are inadmissible then the summary reports are inadmissible.

Respectfully submitted this 28th day of November 2024,

/s/ MARIO WILLIAMS
Virginia Bar # 91955

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the **MOTION FOR ORDER**

TO IDENTIFY EACH DOUMENT RELIED UPON TO CREATE EACH

SUMMARY REPORT FOR USE AT TRIAL upon the Defendant by e-filing a true

and correct copy of the same via electronic filing addressed to counsel for the

Defendant as follows:

Matthew Hicks

Williams Montague

Respectfully submitted this 28th day of November 2024,

/s/ MARIO WILLIAMS

Virginia Bar # 91955

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